

Ricoh Group Supplier Code of Conduct

July 2020

Ricoh Company, Ltd
Global Procurement Division

◆ RBA Code of Conduct Compliance

The Ricoh Group Supplier Code of Conduct is based on the RBA Responsible Business Alliance (RBA) Code of Conduct, a set of social, environmental and ethical industry standards that reference most of the major international norms and standards.

Compliance with the code of conduct ensures that the working environment of the supplier is safe, and that the workers are treated with respect and dignity. It provides action standards for ethically conducting business together, how the business is carried out, and responsibility for the environment.

This Code covers not only the parts and materials used to manufacture products, but also the machinery and equipment as well as office supplies, etc. necessary for conducting business activities. We work with suppliers and all those involved in the entire supply chain, covering all transactions including purchases and provision of service to implement the code.

◆ Established • Revision

The Ricoh Group has adopted the Ricoh Group's CSR Principles and Ricoh Group Code of Conduct. With the understanding and support of all members of the Ricoh Group, we will work with our suppliers to create a better society and global environment and to sustain our company. We established the Ricoh Group Supplier Code of Conduct in January 2006 with the aim of continuing efforts to develop society, the global environment and the companies in our supply chain. We require all our suppliers to comply with the code of conduct, deeply understand the necessity of the code, and implement CSR throughout their entire supply chain. We ask you to develop a code of conduct in order to promote our efforts.

The Ricoh Group is committed to the basic principles and rights of people at work in line with the UN Guiding Principles on Business and Human Rights. Complying with the RBA Code of Conduct, which is based on major international human rights standards, including the relevant ILO Declaration and the Universal Declaration of Human Rights, we revised the "Supplier Code of Conduct".

For suppliers implementing the Supplier Code of Conduct, the working environment is safe, and the workers are treated with respect and dignity.

We would also like all Ricoh Group Members as well as our suppliers to ethically work on this revised Code of Conduct for conducting business and, at the same time, to be environmentally responsible.

◆ Structure of this Code

This Code is organized into five sections.

A 『LABOR』

B 『HEALTH & SAFETY』

C 『ENVIRONMENT』

D 『ETHICS』

E 『MANAGEMENT SYSTEMS』

◆ Proactive leadership of this code

The Ricoh Group takes the lead with this Code, introducing it to the top management of suppliers to help them establish an effective governance system

When it is necessary to initiate actions to solve violations of this Code, the person responsible should accept full accountability and strictly adhere to all demands made.

A. LABOR

Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized standards, as set out in the annex, were used as references in preparing the Code and may be a useful source of additional information.

The labor standards are:

1) Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

2) Young Workers

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Participant shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Participant shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

3) Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

5) Humane Treatment

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

6) Non-Discrimination

Participants should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

7) Freedom of Association

In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

B. HEALTH and SAFETY

Participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.

The health and safety standards are:

1) Occupational Safety

Worker potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.

2) Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

3) Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

4) Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards.

5) Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

6) Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

7) Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Participant or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8) Health and Safety Communication

Participant shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards.. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns

C. ENVIRONMENTAL

Participants recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

The environmental standards are:

1) Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

2) Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved or by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

3) Hazardous Substances

Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

4) Solid Waste

Participant shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Participant shall conduct routine monitoring of the performance of its air emission control systems.

6) Materials Restrictions

Participants are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

7) Water Management

Participant shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Participant shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8) Energy Consumption and Greenhouse Gas Emissions

Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Participants are to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Participants and their agents are to uphold the highest standards of ethics including:

1) Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Participants shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

3) Disclosure of Information

All business dealings should be transparently performed and accurately reflected on Participant's business books and records. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4) Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and, customer and supplier information is to be safeguarded.

5) Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld.

6) Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers¹ are to be maintained, unless prohibited by law. Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

7) Responsible Sourcing of Minerals

Participants shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

8) Privacy

Participants are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Participants are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

9) Coexistence with the community * Ricoh group's original Requirements *

It is required that suppliers contribute to society of their own free will and responsibility.

9-1). To respect the culture and customs of each country/region

Suppliers will act with respect for the history, culture and customs of each country and region.

9-2). To implement social contribution activities that contribute to the local community

Suppliers will strive for social contribution activities that are closely linked to the local communities and the cultural and economic development of the community so that they are welcomed, familiarized and trusted by the communities.

9-3). To foster a corporate culture that values social contribution activities

Suppliers will strive to foster a corporate culture that values social contribution activities.

¹ Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

E. MANAGEMENT SYSTEMS

Participants shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

1) Company Commitment

A corporate social and environmental responsibility policy statements affirming Participant's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.

2) Management Accountability and Responsibility

The Participant clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

3) Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

4) Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety² and labor practice and ethics risks associated with Participant's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance

5) Improvement Objectives

Written performance objectives, targets and implementation plans to improve the Participant's social and environmental performance, including a periodic assessment of Participant's performance in achieving those objectives.

² Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.

6) Training

Programs for training managers and workers to implement Participant's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

7) Communication

A process for communicating clear and accurate information about Participant's policies, practices, expectations and performance to workers, suppliers and customers.

8) Worker Feedback, Participation and Grievance

Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.

9) Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

10) Corrective Action Process

A process for timely revision of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

11) Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

12) Supplier Responsibility

A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

13) Strict control of imports and exports * Ricoh group's original demands *

13-1) Ricoh demands that suppliers respect and comply with international efforts regarding import/export transactions (freight or related technologies) and the trade-related laws and regulations of each country. Ricoh also demands that suppliers construct an appropriate management system so that they carry out proper import/export transactions.

13-2) Based on the spirit of non-proliferation imports and exports, if there is a risk or doubt that the cargo traded and the technology provided are diverted to weapons or the development of weapons, suppliers must not trade them. If there is a risk or doubt after conducting strict screenings of customers and transactions, suppliers should leave a record of the screenings and the manager should make the decision on transaction acceptability.

14) Prohibition of involvement in antisocial acts. * Ricoh group's original demands *

Ricoh requires that suppliers take a resolute attitude against anti-social forces, organized criminal groups, individuals, and others that may not be explicitly recognized as criminal groups but nevertheless participate in criminal activities to further their financial interests through violence, intimidation, or fraud and have no relationships at all with any such entities.

14-1) No relationship with antisocial activities or forces

Officers and employees should have no relationships with any antisocial activities or forces that pose a threat to the order and safety of civil society and hinder economic activities.

14-2) Not compromising unjustified demands from anti-social forces

Officers and employees must not compromise with money if they receive an unreasonable demand from antisocial forces.

Officers and employees must immediately report to their superiors when a situation involving unreasonable demands occurs, and the superiors must contact the company's anti-social forces response management department.

14-3) No trading with antisocial forces

Officers and employees must not make any transactions with antisocial forces.

15) Information security * Ricoh group's original demands *

Ricoh demands that suppliers manage information acquired or created in the course of business under appropriate security measures.

Ricoh also demands that suppliers manage the information commissioned and collected by third parties (customers, business partners, etc.) as a corporate secret.

15-1) To follow management rules

When officers and employees create or acquire information, materials or any kind of information at work, they report it to the superiors and follow the company's related regulations.

Officers and employees comply with the content of the document to prevent leakage of trade secrets established by the company after they leave the company.

15-2) To disclose according to authority

If officers and employees receive inquiries about business or are requested to provide related materials whether inside or outside the company, except when it is clear that officers and employees have the authority to respond to the request to provide the materials, officers and employees must ask superiors for instructions on how to handle them.

15-3) No private use

Officers and employees may use the trade secrets only for the business of the company and must not to use them privately or divulge them to a third party not only while in office but also after retirement.

15-4) Do not obtain information by unauthorized means

Officers and employees must not obtain third party information by unauthorized means.

15-5) No use for anything other than purpose/condition

Officers and employees must follow the purpose and conditions specified in the contract when using the information obtained by a third party.

◆ Request from Ricoh

If you can agree to “Ricoh Group Supplier Code of Conduct”, please sign and return the attached “Confirmation Form” to the person in charge at Ricoh Group.

In case of violations against “Ricoh Group Supplier Code of Conduct”, considering the importance of the situation, Ricoh Group may stop transactions.

◆ Ricoh Group “Supplier Hotline”

Ricoh has established the “Supplier Hotline” which accepts violations to the applicable laws and regulations, Ricoh Group Supplier Code of Conduct, and violations of contract with suppliers caused by Ricoh and Ricoh Group’s officers and employees.

1) The reports we accept on “Supplier Hotline”

The conduct of officers and employees of each Ricoh Group company is governed by laws and regulations as well as the Ricoh Group Code of Conduct.

If you find that officers and employees of the Ricoh Group have (or may have) breached any of the above rules, laws or regulations, or any contract with you as a supplier, please contact the Supplier Hotline with the details.

Please refrain from malicious reporting, which includes reporting for improper purposes, such as reporting contents that are different from the facts, reporting contents for purposes of slander, intimidation or business obstruction.

2) How to report to the Supplier Hotline

Reports to the Supplier Hotline are accepted through the report form on this site (See below). Please enter the name and e-mail address of the whistle-blower in order to confirm more detailed facts.

3) Response to the reports

Reports to the Supplier Hotline are received and the relevant facts are confirmed by a department not in charge of Ricoh’s normal procurement. We conduct corrective actions promptly when necessary. The whistleblower shall not receive disadvantageous treatment by Ricoh Group merely by submitting the report itself.

4) Handling of personal information

The personal information collected in this form will not be disclosed to anyone other than to those that have the need to know to confirm the facts and conduct the investigation, etc. We will only use the information in responding to your requests and for the necessary procedures.

The personal information sent by you will be managed under appropriate security measures and will be managed in strict confidence so that there will be no disadvantage caused to you through the investigations. We will not disclose or provide the information to third parties without your prior consent.

Ricoh Group Supplier Code of Conduct
Enforced on July 2020

Ricoh Company, Ltd
Global Procurement Division